

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ERIC INSELBERG and INSELBERG
INTERACTIVE, LLC,

Plaintiff,

v.

BRIAN C. BROOK, ESQ.; TIMOTHY R.
CLINTON, ESQ.; CLINTON BROOK & PEED;
BROOK & ASSOCIATES, PLLC; CLINTON &
PEED; and JOHN DOES, ESQS., 1-10 and JANE
DOES, ESQS., 1-10 (a fictitious designation for
presently unknown licensed attorneys,
professionals and/or unknown persons or entities),
jointly, severally and in the alternative,

Defendants.

Case No. 20-CV-10789

**CERTIFICATION OF BRIAN C.
BROOK IN SUPPORT OF RULE
12(b)(6) MOTION TO DISMISS**

I, Brian C. Brook, hereby certify to the following facts:

1. I am an attorney at law licensed to practice in the States of New York, New Jersey, and the District of Columbia. I am the sole member of the Law Firm of Brook & Associates, PLLC, which was formerly a partner of Clinton Brook & Peed. I have personal knowledge of the facts certified to herein.

2. I make this certification to the court in support of the Rule 12(b)(6) motion to dismiss filed by Defendants Brian C. Brook, Brook & Associates, PLLC, and Clinton Brook & Peed.

3. Attached as Exhibit A is a true and correct copy of Plaintiffs' Amended Complaint that was sent to me by email from Plaintiffs' counsel.

4. Attached as Exhibit B is a true and correct copy of the final fee resolution agreement and accounting dated May 23, 2018, signed by Timothy Clinton on behalf of Clinton Brook &


Peed, and by Eric Inselberg, both individually and on behalf of Inselberg Interactive, LLC. It has been redacted by counsel for the New York Giants.

5. Attached as Exhibit C is a true and correct copy of the engagement agreement between Clinton Brook & Peed and Plaintiffs concerning a dispute between Plaintiffs and Frank Bisignano relating to Plaintiffs' default on a debt that was secured by certain patents and sports memorabilia.

6. Attached as Exhibit D is a true and correct copy of the amendment to the Bisignano matter engagement agreement, including an agreement on the fees to be charged based on work and relief obtained up to that point.

7. Attached as Exhibit E is a true and correct copy of the final judgment and order of dismissal entered in the case filed against Bisignano.

I hereby certify that the foregoing statements are true and accurate to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



Brian Brook

Date: September 9, 2020